

Geoffrey L. Harrison, admitted *Pro Hac Vice*  
Susman Godfrey LLP  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 653-7807; Fax: (713) 654-6666  
Email: gharrison@susmangodfrey.com  
Attorney-in-Charge for KBR Defendants

Jeffrey S. Eden, OSB #851903  
Schwabe, Williamson & Wyatt, P.C.  
Pacwest Center  
1211 SW 5th Ave., Suite 1900  
Portland, Oregon 97204  
Telephone: (503) 222-9981; Fax: (503) 796-2900  
Local Counsel for KBR Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

ROCKY BIXBY, et al,

Plaintiffs,

vs.

KBR INC., et al.,

Defendants.

Civil No.: 3:09-cv-632-PK

KBR's Motion to Exclude Dr. Arch Carson's  
Testimony re Genetic Transformation Injury,  
Remote Exposure Injury, and Medical  
Monitoring

ORAL ARGUMENT REQUESTED

Pursuant to Fed. R. Civ. P. 702, the Court should exclude the unreliable testimony of Dr. Arch Carson. This motion is supported by the Court's file and record in this matter, by the Affidavit of Johnny W. Carter and attached exhibits, by the accompanying memorandum in support of the motion, and by any oral argument that may be held on this motion. Pursuant to District of Oregon Local Rule 7.1(a)(1), counsel for defendants (Mr. Harrison) certifies that he conferred in good faith by telephone with counsel for plaintiffs (Mr. Hawkins) concerning the

issues raised in this motion and the accompanying memorandum, but the parties were not able to resolve those issues. Plaintiffs oppose the relief sought in this motion.

Dated: April 20, 2012

Respectfully submitted,

/s/ Geoffrey L. Harrison

Geoffrey L. Harrison (Admitted *Pro Hac Vice*)

Texas State Bar No. 00785947

S.D. Admissions No. 16690

[gharrison@susmangodfrey.com](mailto:gharrison@susmangodfrey.com)

SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

Houston, TX 77002-5096

Telephone: (713) 653-7807

Facsimile: (713) 654-6666

Attorney-in-Charge for Defendants KBR, Inc.,  
Kellogg Brown & Root Services, Inc., KBR  
Technical Services, Inc., Overseas Administration  
Services, Ltd., and Service Employees  
International, Inc.

Of Counsel:

Jeffrey S. Eden

[jeden@schwabe.com](mailto:jeden@schwabe.com)

SCHWABE, WILLIAMSON & WYATT

1211 SW 5th Avenue, Suite 1900

Portland, Oregon 97204

Telephone: (503) 796-2837

Facsimile: (503) 796-2900

Vineet Bhatia  
Texas State Bar No. 00795976  
S.D. Admissions No. 20187  
[vbhatia@susmangodfrey.com](mailto:vbhatia@susmangodfrey.com)  
J. Hoke Peacock III (Admitted *Pro Hac Vice*)  
Texas State Bar No. 15673980  
S.D. Admissions No. 13529  
[tpeacock@susmangodfrey.com](mailto:tpeacock@susmangodfrey.com)  
Johnny W. Carter (Admitted *Pro Hac Vice*)  
State Bar No. 00796312  
S.D. Admissions No. 21988  
[jcarter@susmangodfrey.com](mailto:jcarter@susmangodfrey.com)  
Chanler A. Langham (Admitted *Pro Hac Vice*)  
Texas State Bar No. 24053314  
S.D. Admissions No. 659756  
[clangham@susmangodfrey.com](mailto:clangham@susmangodfrey.com)  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002-5096  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666

Jordan Connors (Admitted *Pro Hac Vice*)  
Washington State Bar No. 416499  
[jconnors@susmangodfrey.com](mailto:jconnors@susmangodfrey.com)  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue  
Seattle, Washington 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883

Raymond B. Biagini (Admitted *pro hac vice*)  
[rbiagini@mckennalong.com](mailto:rbiagini@mckennalong.com)  
Kurt J. Hamrock  
[khamrock@mckennalong.com](mailto:khamrock@mckennalong.com)  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street NW, Suite 100  
Washington, D.C. 20006-11808  
Telephone: (202) 496-7500  
Facsimile: (202) 496-7756